

FILED

OCT 06 2022

UNITED STATES DISTRICT COURT
for the

Northern District of Oklahoma

Mark C. McCarr, Clerk
U.S. DISTRICT COURT

United States of America)
v.)
) Case No. 22-mj-638-SH
Daniel Christopher Edwards)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 5, 2022 in the county of Tulsa in the Northern District of Oklahoma, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
26 U.S.C. § 5861(d)	Unlawful possession of an unregistered Incendiary Bomb

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Madison Rebel
Complainant's signature

Special Agent Madison Rebel, ATF
Printed name and title

Sworn to before me by phone.

Date: 10/6/22

Susan E. Huntsman
Judge's signature

City and state: _____ Tulsa, OK

Susan E. Huntsman, United States Magistrate Judge
Printed name and title

AFFIDAVIT FOR CRIMINAL COMPLAINT

I, Madison Rebel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) within the meaning of 18 U.S.C. § 3051, and as such, am an officer of the United States who is authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States. I have been employed in this capacity since July 2021, and I am currently assigned to the ATF Tulsa Field Office. I completed the Criminal Investigator Training Program required by the ATF in October 2021. I also completed Special Agent Basic Training required by ATF for all new special agents. I possess a Bachelor of Science degree in Biology as well as a degree in Criminology. In connection with my official duties as an ATF Special Agent, I investigate criminal violations of federal firearms laws, federal arson laws, federal explosives laws, and federal narcotics laws.

2. As a result of my training and experience I am familiar with the federal firearm laws. I know that pursuant to Title 26 United States Code, Section 5861(d) it is unlawful for a person to receive or possess a firearm which is not registered to him in the National Firearms Registration and Transfer Record. I also know it is unlawful for a person to manufacture a firearm required to be registered in the National Firearms Registration and Transfer Record. The term firearm is used differently in this section than in the firearms offenses found in Title 18. Title 26, United States Code, Section 5845 includes the following definition of "firearm" as a destructive device. The term "destructive device" mean - (A) any explosive, incendiary, or poison gas -(i) bomb, (ii) grenade, (iii) rocket having a propellant charge of more than four ounces, (iv) missile

having an explosive or incendiary charge of more than one-quarter ounce, (v) mine, or (vi) device similar to any of the devices described in the preceding clauses.

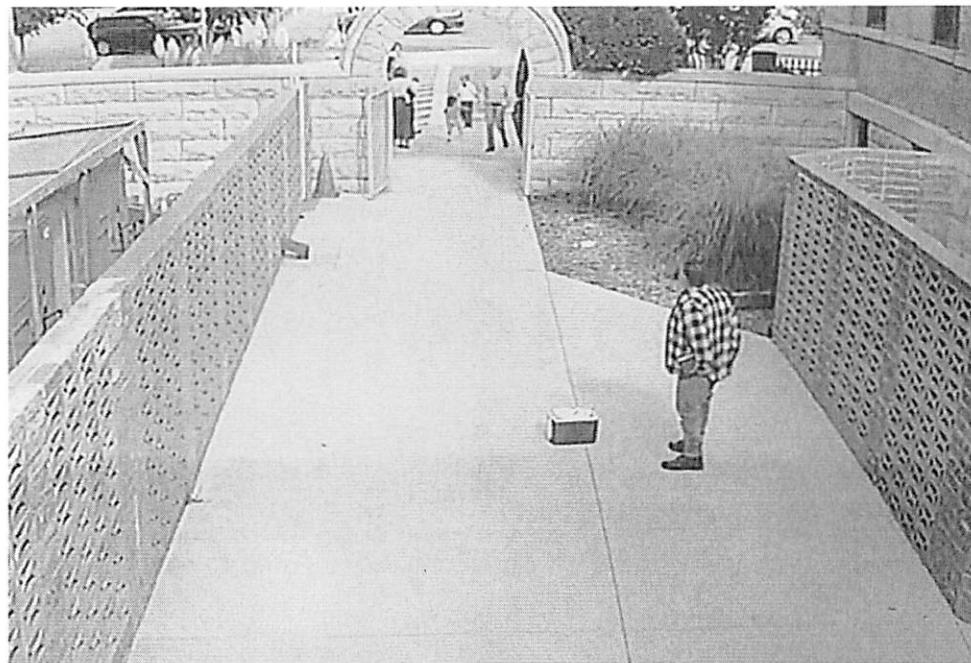
3. This affidavit is intended for the limited purpose of establishing probable cause in support of a criminal complaint alleging that **Daniel Christopher EDWARDS** did possess a firearm not registered to him in violation of Title 26 United States Code, Section 5861(d). The statements made in this affidavit are based in part by information provided to me by other investigators, my own personal participation in the investigation, criminal history maintained by several law enforcement agencies and the training and experience of myself and other law enforcement officers.

PROBABLE CAUSE

4. On October 5, 2022, at approximately 4:15 pm, ATF personnel received information that a church fire involving Molotov Cocktails occurred at the Holy Family Cathedral, which is also home to the Holy Family Classical School, located at 820 S Boulder Ave, Tulsa, OK 74119, which is located within the Northern District of Oklahoma. This is also a property that affects interstate or foreign commerce, as the church also houses the Holy Family Classical School. ATF personnel arrived on scene and were informed that the Tulsa Police Department, as well as the Tulsa Fire Department, were already on scene. ATF personnel were informed by Tulsa Police that a male victim was located with defensive laceration wounds in the basement of the Holy Family Classical School. The victim was transported to a local hospital, where underwent surgery for his wounds.

5. Tulsa Police and ATF personnel recovered video from the church which displayed an adult white male, wearing a yellow and black checkered jacket, later identified as **Daniel Christopher EDWARDS**, herein referred to as **EDWARDS**, bring a red and white Igloo cooler

into a breezeway on the side of the church. The following is an image of **EDWARDS** with said cooler:



9. The victim that was initially located at the scene was observed making contact with the **EDWARDS** on the video. Once contact was made, **EDWARDS** was observed pulling out a sword from inside of his clothing and began slashing at the victim. The following is a screen capture from the video which depicted **EDWARDS** with a sword attacking the victim:



10. After the victim fled the scene, **EDWARDS** was observed walking back to the cooler and appeared to pull a glass object out of the Igloo cooler. He lit a piece of fabric, which functioned as a wick, on fire. (This type of device is commonly referred to as a Molotov Cocktail.) The screen capture below depicts **EDWARDS** after lighting the suspected Molotov Cocktail on fire and throwing it at the church's exterior wall.



11. The suspected Molotov Cocktail in the video ignites after striking the wall. The screen capture shows the suspected Molotov Cocktail igniting upon impact:



12. **EDWARDS** was subsequently seen lighting another suspected Molotov Cocktail which he also threw towards the church. **EDWARDS** was then observed leaving the scene out view on the video, leaving behind the red and white igloo, which also caught fire.

13. Shortly after ATF personnel reviewed video and evidence at the scene, **EDWARDS** was found at a Reasor's, located at 7114 S Sheridan Rd, Tulsa, OK, after having walked in and told a security guard that they better not come near him, and if they don't, he would press a button that would be worse than a bomb. **EDWARDS** was subsequently taken into custody wearing the same clothing he was wearing while at Holy Family Cathedral. **EDWARDS** vehicle was subsequently located in the parking lot of Reasor's.

14. As for **EDWARDS**'s vehicle, it is described as a 2010 Gray Ford Fusion bearing Oklahoma license plate KHJ621, VIN# 3FAHP0HA7AR307989. The vehicle was parked and secured at Reasor's, located at 7114 S Sheridan Rd, Tulsa, OK, within the Northern District of

Oklahoma. Agents' have observed what appears to be a machete in the back floorboard of the vehicle. Agents obtained a federal search warrant for **EDWARDS's** vehicle. During the search, agents recovered a machete with a bent blade covered in what appeared to be blood. The following items were also located in the vehicle: a black and red bag containing a gas can with liquid agents believed to be gasoline, a funnel, a gas can nozzle, and a scabbard.



15. Agents obtained a federal search warrant for the residence of **EDWARDS** located at 6042 S. Santa Fe, Tulsa Oklahoma within the Northern District of Oklahoma. The following items were recovered during the search; a bible with pages torn out and burlap material within the pages, zippo lighter packaging, zippo lighter fluid, a black iPhone, and notebook containing religious writings. Agents also observed a cooking pot in the kitchen filled with pickle juice and sliced pickles. The burlap material found in the bible was consistent with the piece of fabric, which functioned as a wick, used in the Molotov Cocktail. The zippo lighter packaging was consistent with the zippo lighter that was found at Holy Family Cathedral.

16. After **EDWARDS** was arrested by the Tulsa Police Department and brought to Tulsa Police Department Detective Division, I observed **EDWARDS** wearing a yellow and black checkered jacket, jeans, and black boots. I identified the clothing to be the consistent with the clothing worn by the individual seen in the photos shown above at Holy Family Cathedral.

17. RAC Ashley Stephens has spoken with ATF Explosive Enforcement Officer Gary Smith and provided him with pictures of the remnants of the Molotov cocktail and the security video from the church. According to EEO Smith, the items in these images and video are consistent with two improvised incendiary weapons. Pending final physical examination and laboratory analysis report, it is his opinion that the items shown in these images would be properly identified as improvised incendiary bombs. Incendiary bombs are destructive devices as that term is defined in 18 U.S.C. 5845(f) and incendiary devices as that term is defined in 18 U.S.C. Chapter 40, and would be regulated in accordance with the Federal Firearms Regulations. Furthermore, this incendiary bomb would be required to be registered within the National Firearms Registration and Transfer Record (NFRTR). RAC Stephens queried the NFRTR and that **EDWARDS** did not have any items registered to him as would be required by law.

18. Since this affidavit is being submitted for the limited purpose of enabling a judicial determination of whether probable cause exists to justify the issuance of a criminal complaint, I have not included each and every fact known concerning this investigation to me and others involved in this matter. I have set forth only the facts that I believe are essential to establish the necessary foundation for a criminal complaint. Furthermore, I believe there is probable cause to believe that **Daniel Christopher EDWARDS** committed

a violation of Title 26 United States Code Section 5861 (d) within the Northern District of Oklahoma.

Madison Rebel

Madison Rebel
Special Agent, ATF

Subscribed and sworn to me by phone this 6th day of October, 2022.

Susan Huntsman

Susan Huntsman, United States Magistrate Judge